

# EXHIBIT 10

1 UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 GOVERNMENT OF THE UNITED )  
4 STATES VIRGIN ISLANDS )

5 Plaintiff, )

6 vs. )

7 JPMORGAN CHASE BANK, N.A., )

8 Defendant/Third- )  
9 Party Plaintiff. )

10 JPMORGAN CHASE BANK, N.A. )

11 Third-Party )  
12 Plaintiff, )

13 vs. )

14 JAMES EDWARD STALEY, )

15 Third-Party )  
16 Defendant. )

17 FRIDAY, MAY 26, 2023

18 CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

19 \*\*CONFIDENTIAL BSA PORTIONS UNDER SEPARATE COVER\*\*

20 - - -

21 Videotaped deposition of James  
22 Dimon, held at the offices of JPMorgan Chase,  
23 383 Madison Avenue, New York, New York,  
24 commencing at 9:02 a.m. Eastern, on the above  
25 date, before Carrie A. Campbell, Registered  
Diplomate Reporter and Certified Realtime  
Reporter.

- - -

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1 trial Monday. Take care.

2 MR. BUTTS: Sounds like no  
3 holiday for you.

4 MS. FRIEDMAN: Should we take a  
5 break?

6 MR. BUTTS: Yeah, let's do.

7 VIDEOGRAPHER: We're going off  
8 record. The time is 10:30.

9 (Off the record at 10:30 a.m.)

10 VIDEOGRAPHER: We're going back  
11 on record. The time is 10:39.

12 DIRECT EXAMINATION

13 QUESTIONS BY MS. SINGER:

14 Q. Good morning, Mr. Dimon. My  
15 name is Linda Singer. I would like to say I  
16 bring down the average age of the examiners  
17 on our side, but I don't know that that's  
18 true, actually, so I'm going to skip that.

19 I don't think we did this at  
20 the outset, so could you state your position  
21 for the record, please?

22 A. I am chairman and chief  
23 executive officer of JPMorgan Chase.

24 Q. And where generally do you  
25 reside?

1 A. New York City.

2 Q. And do you have any plans of  
3 moving your residence between now and  
4 November of 2023?

5 A. No.

6 Q. When did you first learn that  
7 Jeffrey Epstein was a customer of JPMorgan?

8 A. I don't recall knowing anything  
9 about Jeffrey Epstein until the stories broke  
10 sometime in 2019. And I was surprised that I  
11 didn't even -- had never even heard of the  
12 guy, pretty much, and how involved he was  
13 with so many people.

14 Q. Were you aware that Jeffrey  
15 Epstein was promoting you to contacts as a  
16 candidate for Secretary of the Treasury?

17 MR. BUTTS: Objection.

18 You may answer.

19 THE WITNESS: Nope.

20 QUESTIONS BY MS. SINGER:

21 Q. Were you aware that JPMorgan  
22 entered into a settlement or settlements with  
23 Jeffrey Epstein?

24 A. Not until recently, no.

25 Q. When did you learn that?

1           A.       I think as part of this case.

2           Q.       Okay. So as part of your  
3       preparation for this deposition or at some  
4       other time?

5           A.       No, it was part of preparation  
6       for this deposition.

7                   (Dimon Exhibit 15 marked for  
8       identification.)

9       QUESTIONS BY MS. SINGER:

10          Q.       We want to play a clip from an  
11       interview that you did recently on CNN.  
12       Hopefully, that will work.

13                   (Video played.)

14          Q.       All right. Mr. Dimon, does  
15       that segment from CNN accurately reflect what  
16       you said during the interview with Poppy  
17       Harlin {sic}?

18                   MS. FRIEDMAN: Harlow.

19                   THE WITNESS: You know, there  
20       was a teeny piece of the interview,  
21       but, yes.

22       QUESTIONS BY MS. SINGER:

23          Q.       Okay.

24          A.       That piece was accurate, I  
25       think.

1           Q.       And what did you rely on to  
2       state that JPMorgan did not have  
3       contemporaneous knowledge of Epstein's  
4       offenses?

5                   MR. BUTTS:  Objection.

6                   THE WITNESS:  I didn't say  
7       that.

8       QUESTIONS BY MS. SINGER:

9           Q.       Okay.  You did say hindsight is  
10      fabulous, correct?

11      A.       I did.

12      Q.       Okay.  So prior to your  
13      interview, what information did you have  
14      about what JPMorgan knew or didn't know about  
15      Jeffrey Epstein and JPMorgan's handling of  
16      his accounts?

17                  MR. BUTTS:  Objection.  And  
18      I'll instruct you not to answer to the  
19      extent that any knowledge comes from  
20      counsel.

21                  THE WITNESS:  I knew very  
22      little about any of this until this  
23      case was opened.  And then of course  
24      I've learned quite a bit since then.

25

1 QUESTIONS BY MS. SINGER:

2 Q. Okay. So in making your  
3 comment that hindsight is fabulous, what  
4 information had you reviewed about what  
5 JPMorgan knew or didn't know about its  
6 handling of Jeffrey Epstein's business?

7 MR. BUTTS: Objection.

8 And the same caution, you  
9 should not reveal any information you  
10 reviewed in the context of discussions  
11 with counsel.

12 THE WITNESS: Well, I mean,  
13 almost all of it was done in  
14 consultation with counsel.

15 MR. BUTTS: Then you can't  
16 answer the question.

17 THE WITNESS: Okay.

18 QUESTIONS BY MS. SINGER:

19 Q. Other than conversations with  
20 your lawyers, which I never mean for you to  
21 reveal, nor would Mr. Butts allow you, did  
22 you have any knowledge of what JPMorgan had  
23 done or knew about Jeffrey Epstein prior to  
24 your interview with CNN?

25 MR. BUTTS: Objection.

1 connection with Mr. Epstein?

2 A. No.

3 Q. Are you aware of whether or not  
4 she worked for Mr. Epstein?

5 A. Nope.

6 Q. On February 26, 2010, Lesley  
7 Groff writes Mr. Epstein on the subject of  
8 Peter, Jes and Jamie. "Shall I have Lynn  
9 prepare heavy snacks for your evening  
10 appointments with Peter Mandelson, Jes Staley  
11 and Jamie Dimon? Or is this to be a nice,  
12 sit-down dinner at 9 p.m.?"

13 And Mr. Epstein replies,  
14 "Snacks."

15 Do you see that?

16 A. Yes.

17 Q. Did you in fact have an  
18 appointment with Peter Mandelson, Jes Staley  
19 and Jamie Dimon?

20 A. I have never had an appointment  
21 with Jeff Epstein. I've never met Jeff  
22 Epstein. I never knew Jeff Epstein. I never  
23 went to Jeff Epstein's house. I never had a  
24 meal with Jeff Epstein. I have no idea what  
25 they're referring to here.



1 I did know Peter Mandelson, and  
2 obviously I knew Jes.

3 Q. Do you have an explanation why  
4 Lesley Groff would have written this e-mail?

5 MR. BUTTS: Objection.

6 You may answer.

7 THE WITNESS: Likely  
8 misinformed. Not likely.

9 Misinformed.

10 QUESTIONS BY MR. BOIES:

11 Q. Now, Mr. Epstein does not write  
12 back to her saying, you're misinformed, Jamie  
13 Dimon is not coming.

14 You see that?

15 A. I don't know what he thought at  
16 the time. He was obviously misinformed. I  
17 never -- this never took place.

18 Q. Okay. Did Mr. Epstein arrange  
19 for you to meet with Ehud Barak?

20 A. Who?

21 MR. BUTTS: Objection.

22 You may answer.

23 THE WITNESS: Who?

24 QUESTIONS BY MR. BOIES:

25 Q. Ehud Barak.

1           A.       I don't think Jeff Epstein ever  
2       arranged for me to meet with anybody, to my  
3       knowledge. And I knew Ehud Barak. We did  
4       not need introductions to anybody.

5                       (Dimon Exhibit 113 marked for  
6       identification.)

7       QUESTIONS BY MR. BOIES:

8           Q.       Let me ask you to look at a  
9       document that has been previously marked as  
10      Exhibit 113.

11                   This is a series of e-mails.  
12      The one at the bottom, January 23, 2008, at  
13      12:44 p.m., says, "Hello Rosa, I think [REDACTED]  
14      may have already e-mailed you, but wanted to  
15      follow up just in case. Jeffrey was talking  
16      to me on the phone and to [REDACTED] who was  
17      standing with him at the same time, so not  
18      sure which one of us was actually to e-mail  
19      you. Jeffrey requested that we give you the  
20      contact e-mail for Ehud Barak so that you  
21      could organize the meeting with Jamie Dimon  
22      and Barak on your end for simplification."

23                   And then Rosa writes to Jes  
24      Staley, "Jes, is it okay for me to contact  
25      Ehud Barak directly to arrange a meeting with

1 Jamie?"

2 And Jes Staley responds, "Go  
3 through Jamie's office."

4 Do you see that?

5 A. Uh-huh.

6 Q. And did Rosa M. da Silva go  
7 through your office to arrange a meeting with  
8 Ehud Barak?

9 A. It would almost certainly have  
10 to have gone through my office. I don't  
11 know -- I've met with Ehud Barak. I don't  
12 know -- I don't need a Jeff Epstein to meet  
13 with Ehud Barak, so I don't know what he had  
14 to do with all of that, but I have met with  
15 him a couple of times.

16 MR. BUTTS: He being Ehud  
17 Barak?

18 THE WITNESS: Ehud Barak, yeah.

19 (Dimon Exhibit 154 marked for  
20 identification.)

21 QUESTIONS BY MR. BOIES:

22 Q. Let me ask you to look at  
23 Exhibit 154.

24 Exhibit 113 that we were just  
25 looking at before was dated back in 2008.

1 Do you see that subject line?

2 A. Where does it say that?

3 Q. The subject line at the very  
4 top.

5 A. Yes.

6 Q. Okay. And again, going down  
7 halfway down, it indicates, "Leon Black is a  
8 prospect of Dennis Sheeran, CEO, and a  
9 prospect of Andrew Young, fin spon."

10 I take it CEO there corresponds  
11 to CEO of the private bank or some division.

12 Is that right?

13 MR. BUTTS: Objection.

14 You may answer.

15 THE WITNESS: I don't know

16 Dennis Sheeran.

17 QUESTIONS BY MS. SINGER:

18 Q. Okay. And fin spon, do you  
19 understand that to mean financial sponsor or  
20 something else?

21 A. Financial sponsor, I  
22 understand, yes.

23 Q. Okay. Okay. And let's go to  
24 the attachment, which is the third page I  
25 gave you.

1 Can you see that it lists Leon  
2 Black as the second name on this list?

3 A. What page are you on?

4 Q. I'm on the very last page, the  
5 third page.

6 A. Yes.

7 Q. All right. And you see Leon  
8 Black listed as status prospect, correct?

9 A. Yes.

10 Q. Okay. And was it your  
11 understanding that Leon Black -- and forgive  
12 me if I'm treading ground that was covered --  
13 was a prospect referred by Jeffrey Epstein?

14 MR. BUTTS: Same objection and  
15 instruction about --

16 THE WITNESS: No one needed a  
17 Jeffrey Epstein referral to get to  
18 Leon Black. He was a major client of  
19 the firm already, at least in the  
20 corporate side, and for all I know,  
21 he's a client of the private bank  
22 before that.

23 QUESTIONS BY MS. SINGER:

24 Q. Although here he's listed as a  
25 prospect.

1 Is that not right?

2 A. That's what it lists. I don't  
3 know if it's true.

4 (Dimon Exhibit 22 marked for  
5 identification.)

6 QUESTIONS BY MS. SINGER:

7 Q. Okay. We're also going to take  
8 a look at Exhibit 22, JPM-SDNYLIT-00150148\_R.

9 Do you recognize Project Jeep,  
10 Mr. Dimon?

11 A. I do not.

12 Q. Okay. So this document is  
13 headed "Project Jeep - Client Review October  
14 2019."

15 Correct?

16 A. Yes.

17 Q. And have you seen this document  
18 before?

19 A. No.

20 Q. At the top --

21 A. Not that I recall.

22 Q. Okay. At the top, it indicates  
23 that it is reviewing three client  
24 relationships related to Jeffrey Epstein  
25 media.